

1 Shou Kun Huang/Henry Huang  
2 2635 Market Street  
3 Oakland, CA 94607  
4 (510) 424-5755

5 **UNITED STATES BANKRUPTCY COURT**  
6 **NORTHERN DISTRICT OF CALIFORNIA**  
7 **SAN FRANCISCO DIVISION**

8 **In re:**

9 **PG&E CORPORATION,**

10 **-and-**

11 **PACIFIC GAS AND ELECTRIC**  
12 **COMPANY,**

13 **Debtors.**

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case)(Jointly Administered)

**INTERESTED PARTY SHOU KUN  
HUANG'S RESPONSE TO  
REORGANIZED DEBTOR'S FORTY-  
FIFTH OMNIBUS OBJECTION TO  
CLAIMS (REDUCED AND ALLOWED  
CLAIMS)**

Claim No. 7920

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19 **STATEMENT IN OPPOSITION TO OMNIBUS OBJECTION**

20 On June 21, 2019, PG&E damaged a sewer line outside my house. Both the city and PG&E  
21 advised me to contact a plumbing company to fix the sewer and to submit a claim to PG&E. I paid  
22 \$8,200 in repairs. I have submitted receipts for \$7,000 from Gly Construction and \$673.09 from  
23 Larrieta Sanitation. These receipts total to \$7,673.09. Instead of estimating "fair-market value",  
24 PG&E simply took that total and divided it by half. That is not an estimate of fair value and my  
25 documentation proves that I paid well over the amount PG&E is offering.  
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Dated: November 24, 2020

By: Shou Kun Huang  
Shou Kun Huang/Henry Huang

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(Lead Case)(Jointly Administered)

**INTERESTED PARTY SHOU KUN  
HUANG'S DECLARATION IN SUPPORT  
OF RESPONSE TO REORGANIZED  
DEBTOR'S FORTY-FIFTH OMNIBUS  
OBJECTION TO CLAIMS (REDUCED  
AND ALLOWED CLAIMS)**

Claim No. 7920

14 **DECLARATION OF SHOU KUN HUANG**

15 I, Shou Kun Huang, "Henry Huang," declare the following is true and correct, and  
16 if called as a witness, I could competently testify to the matters hereinafter set forth which are  
17 within my personal knowledge.

18 **DESCRIPTION OF CASE**

- 19
- 20 1. I am the owner of the property located at 2635 Market Street, Oakland CA,  
21 94619.  
22
- 23 2. On, or about, June 21, 2019 PG&E broke a sewer outside my house.  
24
- 25
- 26
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1           3. Courtney Holmes, Sewer Maintenance Leader for the City of Oakland, told me to  
2 contact PG&E to repair the broken side sewer and to contact a plumbing company. A true and  
3 correct copy of the note from Courtney Holmes is attached as Exhibit "A."

4           4. A service technician from PG&E, "Thomas," also advised that I call a plumbing  
5 company to repair the sewer and to submit a claim with PG&E. A true and correct copy of the  
6 PG&E Service Report is attached as Exhibit "B."

7           5. On, or about, July 3, 2019, I paid \$673.09 to the city of Oakland for a permit to  
8 begin repairs. A true and correct copy of the Permit Filing is attached as Exhibit "C."

9           6. On, or about, July 12, 2019, I paid \$7,000.00 to Gly Construction, Inc. for the  
10 total cost of repairs. A true and correct copy of the receipt from Gly Construction is attached  
11 as Exhibit "D."

12           7. The new repairs were also tested for compliance by the East Bay Municipal  
13 Utility District. A true and correct copy of the Compliance Certificate is attached as Exhibit  
14 "E."

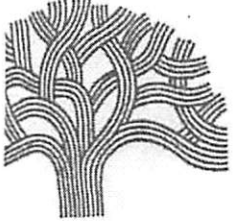
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17           Wherefore I am respectfully requesting that the does not sustain Reorganized Debtor's  
18 Forty-Fifth Omnibus Objection to Claims.

19  
20 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
21 true and correct.

22  
23 Dated: 11/24/20

24   
25 Shou Kun Huang  
26  
27  
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# EXHIBIT A



OF OAKLAND

**TION RESIDENT  
OR MERCHANT  
E CONTACT US**

rm you that our Sewer Maintenance  
access your property for the

main and/or structures  
our city main and/or structures  
est of your sewer lateral from inside  
usiness.

office at (510)615-5969 during normal  
nday through Friday to schedule an

Amy Holmes Date 6-21-2019  
(Print)

from the Public Works Department  
Call Center Monday through Friday,  
and 4:30pm, at (510) 615-5566 or  
[CallCenter@oaklandnet.com](mailto:CallCenter@oaklandnet.com). You can  
reporting form to report a problem at  
[indpw.com/Page876.aspx](http://indpw.com/Page876.aspx)

Please Contact  
PGE To repair Broken  
Side Sewer

City came and inspected there  
main sewer line there  
sewer line is clear

Have Roter Roter  
inspect side sewer with  
camera in get video proof  
of lateral.

Courtney Holmes  
Sewer leader  
6-21-2019

(2)

# EXHIBIT B





**Pacific Gas and Electric Company** 50

# SERVICE REPORT

PG&E Visited your Property Today  
to Service Your Account

Valued Customer: 2635 Market St. Oak

Service Date/Time: 6-21-19 A.M./P.M.

Service Technician: Thomas Confirmation/Field Order # \_\_\_\_\_

Transaction Type: 62996 - 0078

☐ SORRY WE MISSED YOU: Unfortunately we were not able to complete your service request because it requires your presence or the presence of an adult. Please call us at 1-800-743-5000

☐ SORRY WE MISSED YOU: Please see reverse side for additional information

## Gas Service

### Service/Inspection of Gas Equipment

Appliance Type	Inspected	Cleaned Burner Pilot	Filter Inspected	Adjusted	Repaired	Gas Leak Repaired	Appliance Parts Replace Program	Unsafe Condition Identified	Refer to Licensed Contractor
Range									
Oven									
Water Heater									
Heating Appliance									
Dryer									
Pool/Spa Heater									
Other									

## Electric Service

### Service/Inspection of Electric Equipment

Equipment Type	Inspected	Voltage Read	Problem Corrected	Parts/Contractor Referral	Unsafe Condition Identified	Refer to Dealer
Service Panel						
Voltage Problem						
Complete Outage						
Partial Outage						
Electric Range						
Electric Water Heater						
Other						

## Remarks:

Advising to call Roter Rooter or any other plumbing company to have sewer checked + repaired + then call PG&E to put a claim in if you believe we broke your sewer.

No gas smell

Ask for claims.

Courtney Holmes - Oakland Sewer Leader advised as well Case #

## Additional PG&E Work Required

☐ The work you requested will require additional PG&E follow up or repairs to complete. Please refer to your case number above when calling for additional information regarding your request.

**Thank you for the opportunity to serve you**

Were you satisfied with the service? Yes ☐ No ☐ If your answer is "No" how can we improve?

Comments

See the back of this form for additional services



# EXHIBIT C

Permits for which no major inspection has been approved within 180 days shall expire by limitation. No refund more than 180 days after expiration or final.



## CITY OF OAKLAND

250 FRANK H. OGAWA PLAZA ▪ 2ND FLOOR ▪ OAKLAND, CA 94612

Planning and Building Department  
www.oaklandnet.com

PH: 510-238-3891  
FAX: 510-238-2263  
TDD: 510-238-3254

Permit No: SL1901391 OPW - Sewer Lateral  
Job Site: 2635 MARKET ST  
Parcel No: 005 045100800  
District:  
Project Description:

Filed Date: 7/3/2019

Schedule Inspection by calling: 510-238-3444

Repair/replace sewer lateral and EXCAVATE in PUBLIC RIGHT-OF-WAY. Overflow device may be needed. If working within 25' feet of a monument you must comply with State Law 8771, contact the Inspector prior to starting excavation: minimum \$5,800.00 fine for non-compliance. Comply with all terms of City of Oakland Public Works Standards, Street Excavation Rules, Revised March 2015 and City Council Ordinance No. 13300 C.M.S. Five days prior notice required for work lasting five days or less in business/commercial districts; 72 hour notice in residential districts. Ten days prior notice required for work lasting six days or more in all districts. USA # and date must be provided in order to have a permit issued. Permit valid 90 days. Call PWA INSPECTION prior to start: 510-238-3651 or email PWA\_inspections@oaklandnet.com. USA #x917922392

### Related Permits:

*inspection*  
*7-10-19*

	<u>Name</u>	<u>Applicant</u>	<u>Address</u>	<u>Phone</u>	<u>License #</u>
Owner:	HUANG NUAN J & HENRY		2635 MARKET ST OAKLAND, CA		
Contractor:	LARRIETA SANITATION CONSTRUCTION		1818 74TH AVENUE OAKLAND, CA	(510) 773-0518	1007540
Contractor:	Rene Larrieta	X	1818 74TH AVENUE OAKLAND, CA	(510) 773-0518	

*7/12/19 BOMUD PSL VERIFICATION TEST PASSED*

PERMIT DETAILS: Building/Private Infrastructure/Sewer Lateral/NA

### General Information

Sewer Type: Sewer Repair & Sidewalk/Roadway  
Special Provisions:

Street Excavation Permit Required: Yes  
Tree Removal Involved:

### TOTAL FEES TO BE PAID: \$673.09

Application Fee	\$70.00	Recrd Mangmnt & Tech Enhancement Fee	\$86.52	Sewer With Private Property & Sidewalk/Roadway	\$516.57
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Plans Checked By \_\_\_\_\_ Date \_\_\_\_\_

Permit Issued By / Date *7-31-19*

Finalized By \_\_\_\_\_ Date \_\_\_\_\_

# EXHIBIT D



# 快速通渠

GLY CONSTRUCTION, INC. 22907  
EXPRESS PLUMBING

LIC: 951522

11381 Skyline Blvd

2411 Coral Sea Street

Alameda, CA 94501

Tel: (510) 882-1048

(510) 261-6888

(415) 613-6669

Fax: (510) 261-6988

huahaigly@yahoo.com



Customer Name	Date
SHOU KUN HUANG	7/12/2019
Job Address	
2635 MARKET ST.	
Billing Address	
City	Zip
OAKLAND	CA 94607
Phone	Fax
(510) 424-5111	

**Warranty:**  
Warranty only applies to the work on written contract is performed by service technician. Any work has been performed by previous technicians will not be covered under this contract. Any hidden defect, will be charged on revised written contract.

## SERVICE AGREEMENT

此估價不包括肉眼看不見的部分零件及所須人工、稅項等。如在工作途中發現新問題，須請簽一份新合約。因通渠引至渠道爆裂本公司無須負上責任

THE ESTIMATED PRICE DOES NOT INCLUDE ANY HIDDEN DEFECT FOR EXTRA COSTS, OTHER TAX, IF ANY, OR LABOR, WHICH MAY BE REQUIRED AFTER THE WORK BEGINS. ADDITIONAL WRITTEN AUTHORIZATION FROM CUSTOMER WILL BE OBTAINED BEFORE WORKING FOR ANY ADDITIONAL OR EXTENDED WORK.

I HEREBY AUTHORIZE THE PERFORMANCE OF THE WORK, SUBJECT TO ALL THE TERMS AND CONDITIONS SET FORTH ON THIS CONTRACT PLUS ANY TAXES UPON COMPLETION. THIS INVOICE IS DUE AND PAYABLE ON RECEIPT.

ORIGINAL  
ESTIMATE \$

X \_\_\_\_\_  
SIGNATURE

ADDITIONAL  
WORK \$ \_\_\_\_\_ X \_\_\_\_\_  
INITIALS

ADDITIONAL  
WORK \$ \_\_\_\_\_ X \_\_\_\_\_  
INITIALS

ACTUAL  
TOTAL \$

X \_\_\_\_\_  
SIGNATURE

更換熱水爐、暖氣喉、暖氣、水龍頭、銅管、排水管、廁所和室內裝修等一切工程。

## DESCRIPTION SERVICE AND MATERIALS

To replace the main sewer lateral from the side of the house to the city main. approx 90ft of 4" SDR 17 pipe by trench less method. To pull permits from the city department. To saw cut the sidewalk, break the concrete, dig up 3 holes. Connect the pipe to the main sewer pipe. passed inspection. 20 years certificate from the ERMU.

Total cost parts, permits fee, certificate fee and labor:

① paid: 7/01/2019 check # 1069 \$1000

## RECOMMENDATIONS:

② paid cash: \$6000

Service

Sub Total

Sale Tax

Please Pay  
This  
Amount

請留意：如業主不付足所須的人工及費用，本公司有權根據加州法律3084和3146將所屬物業收退和新租。如業主想取消抵付手續費。工作完成後，請在十天內付清所有款項。超過期限收取1.5%手續費。Mechanic's Lien your attention is directed to California Civil code section 3084 and 3146, California's code of civil procedure which requires us to notify you that if bills are not paid in full for labor, service equipment of materials furnished, or to be furnished the improved property (which is described hereon) may be subject to mechanic's lien. Terms: Net cash 10 days after completion of work. A Service charge of 1.5% per month

# EXHIBIT E





## Regional Private Sewer Lateral Program

# Compliance Certificate for Private Sewer Lateral

Parcel Address: **2635 MARKET ST, OAKLAND**

Parcel Number: **005 -0451-008-00**

Expiration Date: **07/12/2039**

Certificate Number: **63685**

Issue Date: **07/12/2019**

Type: **Compliance: replaced lateral**

### Special Instructions:

Retain this PSL certificate for your records for any future parcel sale, re-model greater than \$100,000, or change of water meter size.

This certificate was issued solely on the basis of the performance of the tested sewer lateral in a verification test performed in the presence of EBMUD personnel. The verification test is designed for the sole purpose of determining whether the tested portion of a sewer lateral is free from leaks at the time the test is performed. By issuing this certificate, EBMUD warrants only that the tested portion of the sewer lateral passed a verification test on the date indicated. EBMUD makes no warranty, representation, or guarantee as to the sewer laterals existing or future condition or its compliance with the legal standards of any other jurisdiction, including building or construction standards without limitation. EBMUD expressly disclaims any and all warranties, both express and implied, as to the sewer laterals condition or compliance with legal standards and shall bear no liability in connection therewith.